

EXHIBIT N

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Drew J. Ribar,
Plaintiff,

v.

State of Nevada ex rel. Nevada Department of Corrections, Carson City, et al.,
Defendants.

Case No. 3:24-cv-00103-ART-CLB

**EXHIBIT N – 10-YEAR SOCIAL MEDIA DELETION LOG (BATES NO.
EX032)**

**Filed in Support of Amended Complaint and Summary Judgment Motion (Fed. R. Civ. P.
56)**

Plaintiff Drew J. Ribar, pro se, submits Exhibit N, a 10-year log of **11,653 deleted, hidden, or edited comments** on social media accounts operated by Carson City, including the **Carson City Sheriff's Office (CCSO)**, provided in Excel format by the City in response to a public records request. Filed manually under LR IC 2-2 along with a Notice of Manual Filing, this exhibit confirms a decade-long pattern of comment suppression. It supports Plaintiff's First Amendment and Monell claims and cross-references Exhibits C, E, F, J, K, L, and M.

Key Evidence and Legal Violations

PLEADING TITLE - 1

Section	Incident	Legal Relevance	Cross-Reference
		First Amendment retaliation—	
		establishes systemic suppression	
	11,653 deleted/hidden/edited	of public discourse by city actors.	(recording), E
Deletion	social media comments from	Confirms longstanding policy	(threats), F (arrest),
Log	2014–2024 across Carson	supporting Monell liability	J (complaint), K
(EX032)	City government accounts,	(Monell v. Dept. of Soc. Servs.,	(dismissal), L (2024
	including CCSO.	436 U.S. 658, 1978). Supports	deletions), M (pre-
		retaliation theories under Nieves	deletion notice)
		v. Bartlett and Umbehr.	

Legal Claims Supported

- **First Amendment (42 U.S.C. § 1983):** Retaliation and censorship over years; public forum suppression (O'Connor-Ratcliff v. Garnier, 601 U.S. ___, 144 S. Ct. 717, 2024; Knight First Amendment Inst. v. Trump, 928 F.3d 226; Packingham v. North Carolina, 582 U.S. 98).
- **Monell Liability (42 U.S.C. § 1983):** Decade-long deletion log evidences a **policy/custom** of suppression, substantiated by continued conduct after notice (Exhibit M).
- **Fourteenth Amendment (42 U.S.C. § 1983):** Ongoing viewpoint discrimination and denial of access to a public forum implicates procedural and substantive due process.

- **State Law Claims:** Oppression under color of law (NRS 197.200); intentional interference with prospective economic advantage (28 U.S.C. § 1367).

Summary Judgment Purpose (Fed. R. Civ. P. 56)

Exhibit N proves that Carson City has a **documented, systemic history** of deleting public commentary on its official social media pages—including Plaintiff's. When read with Exhibits L and M, this demonstrates **deliberate suppression** of dissent even after notice. These undisputed facts support **summary judgment**: No reasonable jury could find such conduct justified, and Plaintiff is entitled to judgment as a matter of law.

Authentication

Per Fed. R. Evid. 901, Plaintiff will authenticate this exhibit via attached email record (Exhibit O) from the Carson City Deputy District Attorney, confirming official production in response to Plaintiff's lawful public records request.

Dated: March 28, 2025

/s/ Drew J. Ribar

Drew J. Ribar

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